

1 Jeffrey D. Olster
2 Nevada Bar No. 8864
Jeff.Olster@lewisbrisbois.com
3 Adam J. Pernsteiner
4 Nevada Bar No. 7862
Adam.Pernsteiner@lewisbrisbois.com
5 LEWIS BRISBOIS BISGAARD & SMITH LLP
6 6385 S. Rainbow Boulevard, Suite 600
7 Las Vegas, Nevada 89118
8 Tel: (702) 893-3383
Fax: (702) 893-3789
Attorneys for Defendants
9 *PATENAUME & FELIX APC, RAYMOND A.*
10 *PATENAUME, MICHAEL D. KAHN and*
11 *ANGIE HONG HOAR*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TROY CAPITAL, LLC, a Nevada Limited
Liability Company,
Plaintiff,
vs.
PATENAUME & FELIX APC, *et al.*,
Defendants.

Case No. 2:20-cv-00205-JCM-DJA
**STIPULATION TO ESTABLISH
BRIEFING SCHEDULING FOR
MOTIONS FOR PARTIAL SUMMARY
JUDGMENT**
(First Request)

PATENAUME & FELIX APC,
Counterclaimant/Third-Party
Plaintiff
vs.
TROY CAPITAL, LLC, a Nevada Limited
Liability Company; RANCE WILLEY, an
Individual, and TROY DUPUIS, an
Individual,
Counter-defendant/Third-
Party Defendants

1 IT IS STIPULATED by all parties, through their respective counsel, and pursuant to LR
 2 IA 6-1 and LR 7-1, that the briefing relating to Plaintiff's Motion for Partial Summary Judgment
 3 (ECF No. 92, the "Motion"), filed on November 8, 2021, proceed on the following schedule:

4 1. The current deadline for Defendants to respond to the Motion is November 29, 2021,
 5 which is the Monday following Thanksgiving. The parties agree to extend this deadline by two
 6 weeks to accommodate family obligations of the parties, counsel and witnesses over the holidays.
 7 Additionally, undersigned defense counsel is dealing with an unexpected family health issue, which
 8 requires out-of-town travel this week, and possibly additional time in December as well.

9 2. The parties also anticipate that Defendants will be filing a counter-motion for
 10 summary judgment relating to the subject matter of Plaintiff's Motion (i.e., the Attorney
 11 Agreement). The parties similarly agree to extend Plaintiff's response deadline to accommodate
 12 family obligations of the parties, counsel and witnesses over the holidays.

13 3. Accordingly, the parties' agree on the following briefing schedule for the Motion and
 14 anticipated counter-motion:

15 **December 13, 2021** – deadline for Defendants' response to Motion and
 16 the filing of Defendants' counter-motion

17 **January 10, 2022** – deadline for Plaintiff's reply in support of Motion

18 **January 17, 2022** – deadline for Plaintiff's response to Defendants' counter-
 19 motion

20 **February 14, 2022** – deadline for Defendants' reply in support of counter-motion

22 4. This stipulation is made in good faith and for good cause, and not for any purpose to
 23 delay.

1 5. The parties further agree that this stipulated extension of time does not operate as
2 any admission or waiver of any claim, defense or issue.

3

4 DATED this 24th day of November, 2021

5 LEWIS BRISBOIS BISGAARD &
6 SMITH LLP

7 /s/ Jeffrey D. Olster

8 Jeffrey D. Olster
9 Nevada Bar No. 8864
Adam J. Pernsteiner
Nevada Bar No. 7862
10 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants
11 *PATENAUDA & FELIX APC, RAYMOND A.
PATENAUDA, MICHAEL D. KAHN and
ANGIE HONG HOAR*

DATED this 24th day of November, 2021

RELIEF LAWYERS, LLC

/s/ Dale K. Kleven

Dale K. Kleven
Nevada Bar No. 7778
Thomas M. Fronczek
Nevada Bar, No. 11380
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149
*Attorneys for Plaintiff/Counterdefendant
TROY CAPITAL, LLC and Third-Party
Defendants RANCE WILLEY and TROY
DUPUIS*

13

14 DATED this 24th day of November, 2021

15 SANTORO WHITMIRE

16 /s/ Jason D. Smith

17 Nicholas J. Santoro
18 Nevada Bar No. 0532
Jason D. Smith
19 Nevada Bar No. 9691
10100 W. Charleston Boulevard, Suite 250
20 Las Vegas, Nevada 89135
*Attorneys for
Counterclaimant/Third-Party Plaintiff
PATENAUDA & FELIX APC*

DATED this 24th day of November, 2021

SIMMONDS & NARITA LLP

/s/ Tomio B. Narita

Tomio B. Narita
Jeffrey A. Topor
(Admitted *pro hac vice*)
44 Montgomery Street, Suite 3010
San Francisco, California 94104
*Attorneys for Plaintiff/Counterdefendant
TROY CAPITAL, LLC and Third-Party
Defendants RANCE WILLEY and TROY
DUPUIS*

1 DATED this 24th day of November, 2021.

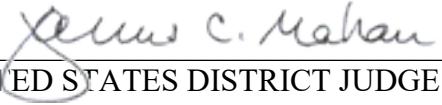
2 PATENAude & FELIX, APC

3 /s/ Joseph DiNoia

4 Joseph DiNoia
5 Nevada Bar No. 11951
6 7271 West Charleston Boulevard, Suite 100
7 Las Vegas, Nevada 89117
8 *Attorneys for*
9 *Counterclaimant/Third-Party Plaintiff*
10 *PATENAude & FELIX, A.P.C.*

11 ORDER

12 IT IS SO ORDERED:

13 
14 UNITED STATES DISTRICT JUDGE

15 November 29, 2021
16 DATED: _____

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 24th day of November, 2021, service of the foregoing
 3 **STIPULATION TO ESTABLISH BRIEFING SCHEDULING FOR MOTIONS FOR**
 4 **PARTIAL SUMMARY JUDGMENT (First Request)** was made upon each party in the case
 5 who is registered as an electronic case filing user with the Clerk, pursuant to Fed. Rule Civ. P.
 6 5(b)(3), and Local Rule 5-4, as follows:

<i>Attorney</i>	<i>Party</i>	<i>Phone/Fax</i>
Dale K. Kleven Thomas M. Fronczek RELIEF LAWYERS LLC 5550 Painted Mirage Road, Suite 320 Las Vegas, Nevada 89149 Email: dale@hrlnv.com fronczeklaw@gmail.com	<i>Attorneys for Plaintiff, Counterdefendant and Third- Party Defendants</i>	P: (702) 589-7520 F: (702) 577-1075
Tomio B. Narita (Admitted <i>pro hac vice</i>) Jeffrey A. Topor (Admitted <i>pro hac vice</i>) SIMMONDS & NARITA LLP 44 Montgomery Street, Suite 3010 San Francisco, California 94104 Email: tmarita@snnlp.com jtopor@snnlp.com	<i>Attorneys for Plaintiff/Counterdefendant Troy Capital, LLC and Third- Party Defendants Rance Willey and Troy Dupuis</i>	P: (415) 283-1000
Joseph DiNoia PATENAUDA & FELIX, A.P.C. 7271 West Charleston Boulevard Suite 100 Las Vegas, Nevada 89117 Email: Joseph.DiNoia@pandf.us Rachel.Saturn@pandf.us	<i>Attorneys for Counterclaimant and Third- Party Plaintiff Patenaude & Felix APC</i>	P: (702) 382-1500 F: (702) 382-1512
Nicholas J. Santoro Jason D. Smith SANTORO WHITMIRE 10100 W. Charleston Boulevard, Suite 250 Las Vegas, Nevada 89135 Email: nsantoro@santoronevada.com jsmith@santoronevada.com	<i>Attorneys for Counterclaimant/Third-Party Plaintiff Patenaude & Felix APC</i>	P: (702) 948-8771 F: (702) 948-8773

26 By /s/ Susan Awe

27 An Employee of
28 LEWIS BRISBOIS BISGAARD & SMITH LLP